

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 15-10271-WGY
	)	
ALEX LEVIN	)	

**STIPULATED PROTECTIVE ORDER**

1. Pursuant to Federal Rule of Criminal Procedure 16(d), the parties hereby stipulate that good cause exists for the following protective order in regard to certain discovery in this case.

2. The defense will not disseminate, duplicate or disclose materials designated as "Sensitive" or "Sealed" to anyone outside of the defendant and the "defense team" as outlined herein without prior approval from the court.

3. "Defense team" shall include the defendant, counsel for the defendant, legal assistants, paralegals, investigators within the Federal Public Defender Office, as well as experts and other individuals hired specifically to assist in the preparation and trial of this case.

4. Notwithstanding the limitations in Paragraph 1, the defense team will be permitted to disseminate, duplicate or disclose materials designated as "Sensitive" to counsel of

record in other pending Website A/Operation Pacifier/Network Investigative Technique cases. When disclosing materials under this Paragraph, the defense team will inform the attorney to whom disclosure is made of the existence of this Order.

5. Nothing in this Stipulated Protective Order should be construed to restrict the use and dissemination of materials unsealed in other jurisdictions or otherwise available in the public domain.

SO STIPULATED:

DATED: January 29, 2016

CARMEN M. ORTIZ  
United States Attorney  
By:

/s/ David G. Tobin  
David Tobin  
Assistant U.S. Attorney

DATED: February 1, 2016

/s/ Samir Zaganjori  
SAMIR ZAGANJORI  
Counsel for ALEX LEVIN

IT IS SO ORDERED.

\_\_\_\_\_  
Hon. MARIANNE B. BOWLER  
United States Magistrate Judge

Dated: \_\_\_\_\_